

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

22-CR-133-RJA-HKS

ROBERT CALKINS, JR,

Defendant.

GOVERNMENT’S WITNESS LIST

THE UNITED STATES OF AMERICA, by and through its attorney, Trini E. Ross, United States Attorney for the Western District of New York, and the undersigned Assistant United States Attorney, hereby submits a list of persons whom the government may call as witnesses during the evidentiary hearing scheduled for January 12, 2023, together with a brief summary of each witness’ anticipated testimony and expected length of testimony. The government reserves its right to call witnesses not listed and will advise promptly of its intent to do so.

**1. BRANDON MOORE, Investigator, New York State Police
Buffalo, New York**

Investigator Moore will testify regarding his interactions with the defendant, Robert Calkins, Jr., during the execution of a search warrant at the defendant’s home on September 10, 2020. Investigator Moore will testify that the defendant voluntarily unlocked his cell phone using his thumb print. Investigator Moore then submitted the cell phones to the New York State Police Forensics Lab for forensic analysis.

The government anticipates that Investigator Moore’s testimony on direct

examination will take approximately 45 minutes.

**2. NATHAN BAKER, Investigator, New York State Police
Albany, New York**

Investigator Baker will testify regarding his forensic analysis of three cell phones seized from the defendant. Investigator Baker will testify that he received the three cell phones in a locked condition, and that he was able to access and examine all three cell phones using available tools regardless of their locked status.

The government anticipates that Investigator Baker's testimony on direct examination will take approximately thirty minutes.

DATED: Buffalo, New York, January 11, 2023.

TRINI E. ROSS
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